

April 15, 2022

VIA ELECTRONIC MAIL

Sarah London
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275 Battery Street, Fl. 29
San Francisco, CA 94111

**Re: *In re: JUUL Labs, Inc. Marketing, Sales Practices & Product Liability
Litigation*, Case No. 19-md-02913; *Robin Bain, B.B. v. JUUL Labs, Inc., et
al.*, Case No. 20-cv-07174**

Dear Counsel:

Pursuant to the parties' agreement regarding the exchange of pretrial materials, Defendants Altria Group, Inc., Philip Morris USA Inc., Altria Client Services LLC, Altria Group Distribution Company, and Altria Enterprises LLC (the "Altria Defendants") provide below a modified witness list identifying the witnesses whom the Altria Defendants expect they may call either live or by deposition designation, based on the information available to the Altria Defendants at this time. Witnesses identified with an asterisk (*) are those the Altria Defendants currently anticipate they are more likely to call.

The witnesses are listed in alphabetical order, and the Altria Defendants make no representation that such witnesses, if called to testify, will be called in the order set forth herein. The Altria Defendants reserve all rights to supplement or amend this list, including but not limited to, the right to:

- A. Call witnesses at trial, in their case-in-chief or otherwise, not included on this list, or to include additional or different witnesses on any list submitted to the Court.
- B. Adjust the list of witnesses currently identified as individuals the Altria Defendants are more likely to call in their case-in-chief.
- C. Supplement and/or amend this list in light of any discovery, including depositions, that has not yet been completed.
- D. Supplement and/or amend this list in light of the evidence Plaintiff elicits at trial.
- E. Supplement and/or amend this list in light of Plaintiff's proposed exhibit list.

- F. Supplement and/or amend this list to be consistent with the Court's ruling on any motions *in limine* filed in this action.
- G. Not call any of the persons listed below.
- H. Rely on the testimony of any witness identified or called by another party.
- I. Question the persons listed below about any topics that are the subjects of testimony by witnesses called by Plaintiff.
- J. Call any witness listed below or any other persons for impeachment or rebuttal purposes.
- K. Submit as evidence deposition testimony taken in this matter, regardless of whether the deponent is listed below, in accordance with the parties' agreed upon designation process.
- L. Call any witnesses to the extent necessary to support the admission of documents into evidence in the event a stipulation cannot be reached concerning the admissibility or authenticity of such documents.

Subject to these reservations of rights, the Altria Defendants' initial list of witnesses they may call and are more likely to call at trial is as follows:

Ref. No.	Witness & Category
	Live
1	Jupe, Richard
2	Murphy, Kevin*
	Live/Deposition
3	Flora, Jason*
4	Hunter, Jennifer*
	Deposition
5	Blaylock, Brian*
6	Burns, Kevin
7	Fernandez, Pascal*
8	Gardner, William*

9	Garnick, Murray*
10	Gifford, William*
11	Gould, Ashley*
12	Longest, Kaitlin
13	Pritzker, Nicholas
14	Schroder, Steven*
15	Willard, Howard*
16	Xu, James

Respectfully,



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cc: Dena C. Sharp
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